

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Annual Assessment of the Status of |) | MB Docket No. 12-203 |
| Competition in the Market for the |) | |
| Delivery of Video Programming |) | |

**COMMENTS OF
Capital Community Television (CCTV) of Salem, Oregon**

Capital Community Television (CCTV) submits these comments in response to the above- captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

Capital Community Television provides the only local TV in the Salem, Oregon area. With about 250,000 people in the cable TV service area, Salem is the largest state capital without a local broadcast station. Except for several radio stations and a monopoly daily newspaper, commercial media have left Salem behind. Caught in between the media markets of Portland and Eugene with little chance of having local commercial TV, visionary leaders in Salem and Marion County decided to take matters into their own hands and create CCTV in 1989.

CCTV, a non-profit organization, fulfilled its charge and mission: we put our community on TV. We used the modest resources and channels provided in the franchise with then-cable operator Viacom and added a tremendous amount of community sweat equity with volunteer effort. A long list of governments, schools and community groups and individuals were televised for the first time, including: the Salem City Council and Marion County Commission; the Salem Hospital, the Salem Chamber of Commerce, and Salem City Club; high school and small college football and basketball; high school and middle school choirs, bands and orchestras; the American Red Cross, Humane Society, YWCA, Salem Art Association and Mano a Mano; local churches and individuals.

Time passed. CCTV's work value in the community dramatically grew. Our cable company merged or was sold three times. Our leaders built on earlier successes, required more community TV resources in the local cable TV franchise and enabled CCTV to build a vital community center of communications. We moved from 2400 square feet in the basement of the Salem Public Library to a modern 9400 square foot center in downtown Salem. We continued to train hundreds of people, televise and stream hundreds of hours of programs made of, by and for our community. We thought that our work and the work of our colleagues around the country was known, and that the importance of local decision-making in public right-of-way management, including local franchising of cable TV, was recognized.

However, we note in the FCC'S NOI the lack of PEG access in Section IV, KEY INDUSTRY INPUTS, A. Video Content Creators and Aggregators. While our budgets are a tiny fraction of those listed, both in Salem and nationwide, our output dwarfs their work. We enter our work for the record. What other TV can match this local record?

Open government: CCTV televises and streams live the Salem City Council, Marion County Commission, Salem-Keizer School Board and Salem Area Transit District, including budget meetings. Meetings are repeated on the channels and added to a ten-year web archive of government meetings. In 23 years, we've televised over 2500 meetings.

Emergency information and training of police and fire staff: CCTV has trained Salem Police and Fire staff, and has provided the studio and technical work that has allowed the Salem Fire Department to provide additional training while avoiding shift disruption and costly overtime. Further, CCTV is being outfitted as a Joint Information Center (JIC) for the City of Salem in the event of large-scale emergencies. Located three blocks from local governments, CCTV will rapidly transform into an information center.

Connecting schools with the community: CCTV televises performing arts class concerts plus sports events. In the past ten days CCTV covered the opening of two new elementary schools to provide in-depth information to the community. CCTV has televised more than 1200 school-related programs.

Connecting non-profit service organizations with the community: in addition to general channel use by about 150 local organizations and government agencies (see attachment), CCTV has produced highly-valued video brochures for service organizations. CCGTV currently has 44 such brochures on its website www.cctvsalem.org/nonprofit/ . These agencies link to CCTV-hosted video for their web pages, YouTube and Facebook.

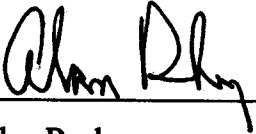
Connecting churches and individuals with the community: many local churches use CCTV's channels to extend their reach. CCTV schedules religious shows in six languages. Individuals take advantage of the same opportunity to reach the community.

Thanks to local franchising and decision-making, our channels are the same in quantity, quality, accessibility and functionality as in June of 2010. Comcast, our MVPD, provides eight PEG channels. Four are in use, with provisions in place for addition of channels as programming grows. Our PEG channels are on the most basic tier, on channels 21, 22, 23 and 27. Extra equipment is required of all subscribers on digital tiers, and Comcast will eliminate the remaining analog tier this fall. CCTV's channels can be received with the same equipment need to receive local broadcast signals.

We have not had the damage inflicted on other communities by AT&T. We have avoided the unfair treatment of PEG channels on U-Verse. Unfair placement and accessibility of U-verse would severely hurt the ability of people in our community to receive our programs.

FCC action is long overdue on the Alliance for Community media petition to undo the AT&T harm. Many communities have suffered the loss of channels and essential resources due to AT&T-sponsored legislation that has stolen local decision-making and eliminated or damaged local franchising. It is the job of the FCC to stand up to AT&T and stop the bleeding now. AT&T claimed that statewide franchising would lead to lower rates and the introduction of new, better technology. Neither has happened. We ask the FCC call AT&T at its game and restore the effective, fair, affordable local cable franchising that has been lost in many states.

We provide an invaluable service in Salem. Our local leaders made our work possible by making fair and modest requirements of our cable companies in return for their very profitable use of our local public rights-of-way. This system works. The FCC goal of competition is being met by the natural actions and work of the commercial industry. We ask that the FCC recognize the value of diverse, local PEG access programs and the need for federal policies that provide the transmission and resources essential to community-based work like ours and that of our colleagues.



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9-7-12

September 7, 2012

CCTV Partial List of Nonprofits Served

1. A.B.A.T.E.
2. A.C. GILBERT'S DISCOVERY VILLAGE
3. AGRI-PLAS
4. AKHA HERITAGE FOUNDATION
5. ALZHEIMER'S NETWORK OF OREGON
6. AMERICAN ASSOCIATION OF UNIVERSITY WOMEN (AAUW)
7. AMERICAN CANCER SOCIETY
8. ASSISTANCE LEAGUE OF SALEM
9. BAHA'IS OF SALEM
10. BLANCHET CATHOLIC SCHOOL
11. BOYS AND GIRLS CLUB
12. BROADWAY LIFE CENTER (SALEM ALLIANCE CHURCH)
13. BROOKS ASSEMBLY OF GOD CHURCH
14. BRUSH CREEK PLAYHOUSE
15. CAMERATA MUSICA
16. CAPITAL CALLIGRAPHERS
17. CAPITOL PRIDE OF SALEM
18. CASA of Marion County
19. CEILI OF THE VALLEY
20. CENTER 50+ (SALEM SENIOR CENTER)
21. CENTER FOR CULTURAL EXCHANGE
22. CHILDREN'S EDUCATIONAL THEATRE
23. CHRISTIAN WORLD FELLOWSHIP
24. CHURCH OF LATTER DAY SAINTS
25. CITY OF SALEM HUMAN RIGHTS & RELATIONS COMMISSION
26. CITY OF SALEM NEIGHBORHOOD ASSOCIATION
27. CITY OF SALEM PUBLIC LIBRARY
28. CITY OF SALEM DEPARTMENT OF COMMUNITY SERVICES
29. CORNERSTONE BAPTIST CHURCH
30. CULTURAL HOMESTAY INTERNATIONAL
31. CULTURE SHOCK COMMUNITY PROJECT
32. DEMUNIZ PINE STREET RESOURCE CENTER
33. FAMILY BUILDING BLOCKS
34. FELLOWSHIP CHURCH
35. FENCES FOR FIDO
36. FERAL CAT COALITION OF OREGON
37. FIRE FIGHTERS BURN FOUNDATION
38. FIRST CHURCH OF CHRIST, SCIENTIST
39. FIRST PRESBYTERIAN CHURCH OF SALEM
40. FIRST UNITED METHODIST CHURCH OF SALEM
41. FREEDOM FRIENDS CHURCH
42. FRIENDS OF BUSH GARDENS
43. FRIENDS OF FELINES
44. FRIENDS OF THE SALEM PUBLIC LIBRARY
45. FULL GOSPEL BUSINESSMEN'S FELLOWSHIP IN AMERICA, SALEM CHAPTER
46. GETSMARTOREGON
47. GIRL SCOUTS OF AMERICA (SALEM)
48. GRUPO 24 HORAS—AA MOVIMIENTO
49. HABITAT FOR HUMANITY (OF THE MID-WILLAMETTE VALLEY)

50. HANDS ARE NOT FOR HURTING PROJECT
51. HISTORIC DEEPWOOD ESTATE
52. HOME YOUTH & RESOURCE CENTER
53. HOPE SEGUN FOUNDATION
54. HOST YOUTH AND FAMILY PROGRAM (NW HUMAN SERVICES)
55. IGLESIA ADVENTISTA DE SALEM
56. INTERFAITH PEACE FESTIVAL
57. JENSEN ARCTIC MUSEUM
58. JOURNEY CHURCH OF SALEM
59. KOREAN CHURCH OF SALEM
60. KROC COMMUNITY CENTER (SALVATION ARMY)
61. LANCASTER ASSEMBLY OF GOD
62. LEAGUE OF WOMEN VOTERS (OF MARION AND POLK COUNTIES)
63. LIBERTY HOUSE
64. LORD & SCHRYVER CONSERVANCY
65. MARION COUNTY DEPARTMENT OF HUMAN RESOURCES
66. MARION COUNTY DOG SHELTER
67. MARION COUNTY HEALTH DEPARTMENT
68. MARION COUNTY OREGON LEAGUE OF CONSERVATION VOTERS
69. MARION COUNTY RECYCLING
70. MARION COUNTY RE-ENTRY INITIATIVE
71. MARION COUNTY SHERIFF'S OFFICE
72. MARION-POLK FOOD SHARE
73. MCKAY HIGH SCHOOL
74. MERIT
75. MID-VALLEY LITERACY CENTER
76. MID VALLEY MENTORS
77. MID-VALLEY TRAVEL CLUB
78. MID-VALLEY WOMEN'S CRISIS SERVICE
79. MID-WILLAMETTE VALLEY COUNCIL OF GOVERNMENTS
80. MIND OPENERS CLUB
81. MISSION MILL MUSEUM
82. MOMS CLUB OF NORTH SALEM/KEIZER
83. MOMS CLUB OF SOUTH SALEM
84. MOPS
85. MORNINGSIDE UNITED METHODIST
86. MY PAL STICKY (DIABETES SUPPORT GROUP)
87. The NATURE CONSERVANCY IN OREGON
88. NEDCO
89. NEIGHBOR TO NEIGHBOR MEDIATION SERVICES
90. NEW HOPE FOURSQUARE CHURCH
91. NORTHWEST HUMAN SERVICES
92. ONENESS COALITION
93. OREGON CHI
94. OREGON.GOV
95. OREGON HEALTH CONNECT
96. OREGON PEACE WORKS
97. OREGON REMEMBERS
98. OREGON'S SMOKEFREE WORKPLACE
99. OREGON SPIRIT CHORUS
100. OROSHA
101. PAULINE MEMORIAL A.M.E. ZION CHURCH

102. PENTACLE THEATRE
103. PLANNED PARENTHOOD
104. PRISON FELLOWSHIP
105. SALEM ART ASSOCIATION
106. SALEM CHAMBER ORCHESTRA
107. SALEM CITY CLUB
108. SALEM CONCERT BAND
109. SALEM FELLOWSHIP OF RECONCILIATION
110. SALEM FIRST FREE METHODIST CHURCH
111. SALEM FIRST PRESBYTERIAN CHURCH
112. SALEM FRIENDS OF FELINES
113. SALEM HEALTH (SALEM HOSPITAL) SALEM-KEIZER TOGETHER
114. SALEM HEALTH – HEART & VASCULAR CENTER
115. SALEM INTERFAITH HOSPITALITY NETWORK
116. SALEM-KEIZER EDUCATION FOUNDATION
117. SALEM KIWANIS CLUB
118. SALEM MULTICULTURAL INSTITUTE
119. SALEM PARKS FOUNDATION
120. SALEM PEACE MOSAIC
121. SALEM POLICE DEPARTMENT (CRIME PREVENTION UNIT)
122. SALEM PROGRESSIVE FILM SERIES
123. SALEM SPIRIT OF LIFE CHURCH
124. SALEM YOUTH SYMPHONY
125. SALEM’S RIVERFRONT CAROUSEL
126. SALEM VET CENTER
127. S.C.O.R.E.
128. SHANGRI-LA
129. S.K.I.T. THEATRE
130. SOUTH SALEM SENIORS
131. SOVAH (SERVING OUR VETERANS AT HOME—STAND DOWN)
132. STAND FOR CHILDREN
133. ST FRANCIS SHELTER
134. ST MARY CATHOLIC SCHOOL
135. ST PAUL’S EPISCOPAL CHURCH
136. SUPREME MASTER CHINGHAI ORGANIZATION
137. TOPS (363-SALEM)
138. TRINITY COVENANT CHURCH
139. TURTLE RIDGE WILDLIFE CENTER
140. UNITARIAN UNIVERSALIST CONGREGATION OF SALEM
141. UNITY OF SALEM
142. WESTGATE CHURCH
143. WESTERN MENNONITE SCHOOL
144. WILLAMETTE ACADEMY
145. WILLAMETTE CHAPTER OF THE NATIVE PLANT SOCIETY
146. WILLAMETTE HERITAGE CENTER (Marion Co. Hist Soc & Mission Mill Museum)
147. WILLAMETTE HUMANE SOCIETY
148. WILLAMETTE MASTER CHORUS
149. WOODLAND CHAPEL, FIRST CHURCH OF RELIGIOUS SCIENCE
150. WOMEN ENDING HUNGER
151. YWCA